

SEYFARTH  
ATTORNEYS  
SHAW LLP

Writer's direct phone

(212) 218-5586

Writer's e-mail

ajeffrey@seyfarth.com

Writer's direct fax  
917-344-1204

SEYFARTH SHAW LLP

USDC SDNY  
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620 Eighth Avenue

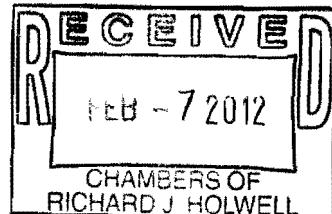
New York, New York 10018-1405

(212) 218-5500

fax (212) 218-5526

www.seyfarth.com

February 7, 2012

VIA FACSIMILE (212) 805-7948

The Honorable Richard J. Holwell  
United States District Court Judge  
United States District Court, Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

*Re: Edelman Arts, Inc. v. Art International (UK), Ltd.  
No. 2006 Civ. 00410 (RJH)*

Dear Judge Holwell:

This firm is counsel for Art International (UK), Ltd., the named defendant in the above-captioned action. We write to request a brief extension of the deadline by which defendant can move for attorneys' fees and related nontaxable expenses from tomorrow February 8, 2012 to February 24, 2012--the same deadline by which defendant must move for taxable costs.

As you are aware, defendant is the prevailing party pursuant to Your Honor's Memorandum Opinion and Order, dated January 24, 2012, and the related judgment entered January 25, 2012. Rule 54 of the Federal Rules of Civil Procedure provides that a motion for attorneys' fees and related nontaxable expenses must be filed within fourteen (14) days from the entry of judgment, whereas Local Rule 54.1 provides that an application for taxable costs can be made within thirty (30) days from the entry of judgment. Our client, who resides abroad, requires additional time to determine whether it will seek attorneys' fees and related nontaxable expenses, but nevertheless intends to seek its taxable costs on or before the February 24, 2012 deadline. Should defendant determine to also seek its attorneys' fees, such application can and will be made in conjunction with its application for taxable costs.

Thus, for the purposes of judicial economy and to permit defendant time to evaluate an application for attorneys' fees, defendant requests that the current deadline of February 8, 2012, by which it must seek attorneys' fees and related nontaxable costs, be extended to February 24, 2012, an extension that, if granted, will not prejudice plaintiff. We conferred with our adversary

→ SO ORDERED  
John R. Shaw (RJH)  
USDC  
14162355v1  
2-8-12

ATLANTA BOSTON CHICAGO HOUSTON LOS ANGELES NEW YORK SACRAMENTO SAN FRANCISCO WASHINGTON, D.C. BRUSSELS

The Honorable Richard J. Holwell

February 7, 2012

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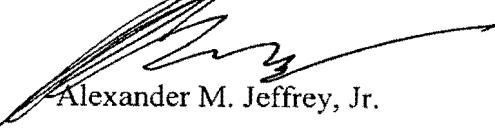


shortly before submitting this letter, but he was unable to either consent to or reject our request before it became necessary to timely submit this letter to Your Honor. This is the first request for such an extension.

Thank you for your consideration.

Respectfully yours,

SEYFARTH SHAW LLP



A handwritten signature in black ink, appearing to read "Alexander M. Jeffrey, Jr." The signature is fluid and cursive, with a large, stylized "A" at the beginning.

cc: Charles A. Stewart III, Esq.– via email

